Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

In the Matter of	)
	)
Improving Public Safety Communications	)
In the 800 MHz band	) WT Docket No. 02-55
	)
Consolidating the 900 MHz Industrial/Land	)
Transportation and Business Pool Channels	)

REPLY COMMENTS OF
AIR LIQUIDE AMERICA CORPORATION

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Charles Neely Harper
Director – Pipeline & Supply Operations

June 5, 2002

After reviewing other proposals filed in this proceeding, Air Liquide America Corporation (ALAC) has the following submission.

ALAC urges the FCC not to take action in the crucial 800 MHz frequency band that would disrupt the activities of critical infrastructure and other user groups, or prevent the future use of this band for advanced technologies. We concur with the FCC that interference to traditional public safety licensees,
critical infrastructure systems and other low-site digital systems is unacceptable and must be resolved.

ALAC, the third largest industrial gas company in the United States, was formed in 1994 through the merger of Liquid Air Corporation, itself present in the United States since 1968, and Big Three Industries, Inc. ALAC products are based on technology that separates air into its component gases, including oxygen, nitrogen, hydrogen, carbon dioxide, carbon monoxide, helium and argon and associated services. ALAC owns and operates approximately 1,500 miles of industrial gas pipelines, including, but not limited to, oxygen, nitrogen, natural gas, steam, water, and hydrogen products. Some of these lines are governed by the DOT. The radio network plays an important role in the safe operation of the system, coordination of maintenance, and response to field emergencies and potential pipeline leaks. ALAC's pipelines are supervised by a 24 hour Operations Control Center (OCC) and are connected to ALAC production facilities that also participate in the communications system.

ALAC owns and operates a network of 800 MHz radio repeater stations and mobile units along the Gulf Coast and Mississippi River as well as in other smaller portions of the United States. These stations coordinate field activities and provide for public safety. This radio network largely follows ALAC's extensive network of pipelines, thereby providing a common central point of communication among the departments and staff responsible for the day to day operation of the pipeline and its interface to the various communities located along the pipeline routes. Public Service and Community organizations count on ALAC to provide near instant field information gathered by the 800 MHz system in a "party line" fashion to coordinate road closure, coordinate utilities, provide public service information and maintain ALAC customer integrity. ALAC employees, management and staff participate in the 800 MHz, which enables them to quickly provide direction and decisions. The communications network also is used to coordinate requests for fire, ambulance, helicopter ambulance, and police support for our field production units. Since there is no technology like "radio", ALAC would be required to maintain the network at all costs. ALAC is also the major supplier of gas and liquid oxygen to hospitals in its area of operation. The 800 MHz communications network is used to dispatch service personnel to maintain and service these liquid and gas installations at hospitals. In addition, in times of emergency and severe weather, the communications network is used as the primary communications link between ALAC plants, the Operations Control Center and customers. ALAC frequently supplies mobile units to its customers so they can participate in the overall operation of the pipeline network and the distribution of gas and liquid through the truck delivery fleet.

The network is divided into cells and these large cells contain a repeater station connected to the main Operations Control Center in Houston as well as to mobile and other units within the cell. Daily operations and coordination include communication to operate valves, calibrate meter and detection stations, relay phone and other messages from contractors and repair/maintenance crews, contact public service agencies regarding work activity, and testing and responding to dig and leak reports. A key function of our radio system is to promote public safety during maintenance and repair to our pipeline system. We recognize the liability that goes with our responsibility as a pipeline operator and are forced to rely upon our own radio system to promote public safety.

The communications network is the single point where ALAC is able to dispatch, change and re-organize activities along the pipeline and throughout the other smaller systems in the US. The single communication backbone provided by the 800 MHz radio system is utilized exclusively for the purpose of maintaining, coordinating field activities and communication with public and private agencies along the pipeline and right of way. The communication system provides a single point were a conference of staff can take place in order to perform trouble shooting and coordination of activities with our production facilities, including both starting up and shutting down the pipeline. In addition, ALAC depends and utilizes the radio backbone during times of bad weather and power outages, which often occur due to the hurricanes and tropical storms that frequently affect the gulf coast. The system also is used to coordinate with public service authorities for access and security issues that affect the Department of Transportation's regulated pipeline systems operated by ALAC.

The 800 MHz radio network continues to enhance our productivity and reliability. If ALAC should be required to migrate to an equivalent system in another part of the spectrum, this would carry with it the issues of funding, equipment selection, project management and coordination with tower owners along the gulf coast, Mississippi River and other parts of the country where the system is currently used. We estimate the cost of re-inventing our system on another band, including the engineering, installation, and creation of a duplicate backbone during the transition in order to maintain safe operations, to be in the range of $400,000 to $450,000.

We urge the FCC not to take action that would require ALAC to migrate to another part of the spectrum.

Respectfully submitted,

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